



## REMARKS

Applicant is in receipt of the Office Action mailed March 4, 2003. Claims 1, 15, 16, 30, 31, and 46 were rejected under § 103(a) as being unpatentable over Limberg (6,441,843). Claims 4-14, 19-29, and 34-45 were objected to as being dependent upon a rejected base claim, but were otherwise stated to be allowable. Applicant respectfully thanks the Examiner for consideration of these claims.

Applicant respectfully submits that the present claims are allowable over the cited references. Claim 1 of the present application recites as follows:

A method for generating pixels for a display device, the method comprising:

- receiving graphics data;
- rendering a first plurality of samples for a frame in response to said graphics data;
- filtering said first plurality of samples using a first filter to generate a first set of output pixels for said frame;
- computing a first negativity value based on said first set of output pixels, wherein said first negativity value measures an amount of negativity in said frame; and
- adjusting said first filter in response to said first negativity value.

The Limberg reference is directed toward adaptive equalizers for digital TV receivers. Applicant does not necessarily believe that this patent is directed toward "generating pixels for a display device". Although Applicant notes that a digital television is a display device, the patent mainly refers to NTSC transmission, and the word "pixel" does not appear at all in the specification of the Limberg patent.

With respect to "receiving graphics data" Applicant submits that the Limberg patent does not teach "graphics data". The Office Action relies on the digitized base band symbol coding input in Figure 2 of Limberg. Applicant notes that the term "graphics data" generally refers to graphics primitives as described on page 18 beginning at line 17 of the present application. Applicant submits that the symbol coding input referred to in Limberg cannot be described as graphics data as used in the present claims.

Claim 1 also includes a step of “rendering a first plurality of samples”. The Office Action states that this limitation is taught in Limberg citing column 2 lines 51-63. Applicant has carefully reviewed this cited portion of Limberg and respectfully disagrees. This section generally refers to supplying digital baseband symbol coding to a channel equalizer. Applicant cannot find any teaching or suggestion of the concept of rendering, or of rendering samples for a frame in response to received graphics data. The Limberg patent contains absolutely no teaching on rendering samples from graphics data.

With respect to the filtering step, the Office Action relies on the channel equalizer 10 in Limberg. Applicant generally acknowledges that the Limberg reference teaches the use of various types of filters, such as FIR filter 11. However, the Limberg patent absolutely does not teach or suggest filtering a first plurality of samples using a first filter to generate a first set of output pixels for a frame. As noted above, the Limberg patent does not even include the concept of “pixels”, does not use the term “pixels” in the entire specification, and certainly does not teach any type of filtering of samples to generate pixels.

Claim 1 also includes a step of “computing a first negativity value ...” The Office Action relies on the error detector for decision feedback block 21 in Limberg. Applicant has reviewed the teaching surrounding this element of Limberg and cannot find any teaching or suggestion regarding computing a negativity value based on output pixels that measures an amount of negativity in a frame.

With respect to the step of adjusting, the Office Action cites the filter coefficient update calculation apparatus 20 in Limberg. Again, Applicant has reviewed this element in the Limberg patent and cannot find any teaching or suggestion regarding adjusting a filter in response to a computed negativity value. Thus, Applicant submits that each of rejected claims 1, 15, 16, 30, 31 and 46 are allowable over the Limberg patent. Applicant respectfully submits that the various dependent claims contain further allowable subject matter, as noted by their allowability in the Office Action. The various dependent claims are also allowable as depending from allowable base claims. Thus, Applicant submits that the present application is in condition for allowance.

Applicant also encloses herewith an Information Disclosure Statement including four issued patents which include the same inventor as the present application. Applicant respectfully submits the present claims are allowable over each of these patents.



## CONCLUSION

Applicant submits the application is in condition for allowance, and an early notice to that effect is requested.

If any extensions of time (under 37 C.F.R. § 1.136) are necessary to prevent the above referenced application(s) from becoming abandoned, Applicant(s) hereby petition for such extensions. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert & Goetzel PC Deposit Account No. 50-1505/5181-54400/JCH.

Also enclosed herewith are the following items:

- ☒ Return Receipt Postcard
- ☒ Information Disclosure Statement with references
- ☒ Fee Authorization
- ☒ Notice of Change of Address

**RECEIVED**

**JUN 10 2003**

**Technology Center 2600**

Respectfully submitted,

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